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SHAPIRO LAW FIRM, P.C.
Jay L. Shapiro (No. 014650)
1819 E. Morten Avenue, Suite 280
Phoenix, Arizona 85020
Telephone (602) 559-9575
jay@shaplawaz.com

LIBERTY UTILITIES
Todd C. Wiley (No. 015358)
12725 W. Indian School Road, Suite D-101
Avondale, Arizona 85392
Todd.Wiley@libertyutilities.com

Attorneys for Liberty Utilities (Entrada Del Oro Sewer) Corp.

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF LIBERTY UTILITIES (ENTRADA DEL
ORO SEWER) CORP., AN ARIZONA
CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE
OF ITS UTILITY PLANTS AND
PROPERTY AND FOR INCREASES IN ITS
WASTEWATER RATES AND CHARGES
FOR UTILITY SERVICE BASED
THEREON.

DOCKET NO: SW-04316A-16-0078

IN THE MATTER OF THE APPLICATION
OF LIBERTY UTILITIES (ENTRADA DEL
ORO SEWER) CORP., AN ARIZONA
CORPORATION, FOR AUTHORITY TO
ISSUE EVIDENCE OF INDEBTEDNESS IN
AN AMOUNT NOT TO EXCEED
\$1,750,000.

DOCKET NO: SW-04316A-16-0085

**MOTION FOR EXTENSION OF TIME
TO FILE REBUTTAL TESTIMONY;
REQUEST FOR HEARING DATE**

Liberty Utilities (Entrada Del Oro Sewer) Corp. ("Liberty EDO" or "Company")
hereby files this Motion for Extension of Time to File Rebuttal Testimony and Request for
Hearing Date in the above-captioned matter.

1 Liberty EDO moves for an extension of the deadline to file rebuttal testimony by
2 one week, from Monday, September 19, 2016 to Monday, September 26, 2016. Counsel
3 for the Company has conferred with counsel for Staff, and Staff has no objection to the
4 Company's extension request.

5 Furthermore, Liberty EDO requests the scheduling of a hearing on its application,
6 to be held as soon as possible after the filing of rebuttal.¹ After rebuttal, there will still be
7 significant issues in dispute and the Company believes a hearing is appropriate under the
8 circumstances.²

9 As set forth above, Liberty EDO requests that the Administrative Law Judge issue
10 a procedural order adopting the revised filing date of September 26 for rebuttal testimony,
11 and setting a date for hearing. The Company consents to a corresponding extension of the
12 timeclock.

13 RESPECTFULLY SUBMITTED this 13th day of September, 2016.

14 SHAPIRO LAW FIRM, P.C.

15
16 By: _____

17 Jay L. Shapiro
18 1819 E. Mormon Avenue, Suite 280
19 Phoenix, AZ 85020
20 jay@shaplawaz.com
21
22

23 ¹ Pre-filed testimony in this matter will conclude with the Company's rebuttal filing.
24 See Staff's Motion for Extension of Time (filed April 8, 2016); Procedural Order
(Schedules Filing Dates) (filed April 15, 2016); Procedural Order (Grants Extension)
(filed July 26, 2016); Procedural Order (Grants Extension) (filed August 11, 2016).

25 ² With respect to dates for hearing, to avoid conflicts on the part of witnesses and legal
26 counsel for the Company and Staff, it is requested that hearing be set to commence on or
after October 13, 2016. It is anticipated that 2 hearing days should be sufficient.

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and

LIBERTY UTILITIES

Todd C. Wiley
Assistant General Counsel
12725 W. Indian School Road, Suite D-101
Avondale, AZ 85392
Todd.Wiley@libertyutilities.com

Attorneys for Liberty Utilities
(Entrada Del Oro Sewer) Corp.

ORIGINAL plus one (1) copy
of the foregoing were delivered
this 13th day of September, 2016, to:

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

COPY of the foregoing was hand-delivered
this 13th day of September, 2016, to:

Sasha Paternoster, ALJ
Hearing Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

COPY of the foregoing was emailed and hand-delivered
this 13th day of September, 2016, to:

Robin Mitchell
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
rmitchell@azcc.gov

By: Whitney Bail